

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CERTAIN UNDERWRITING MEMBERS AT
LLOYD'S OF LONDON,

Petitioner,

16-cv-323 (VSB)

v.

INSURANCE COMPANY OF THE
AMERICAS,

Respondent.

CERTAIN UNDERWRITING MEMBERS AT
LLOYD'S, LONDON SUBSCRIBING TO
TREATY NO. 0272/04,

Petitioner,

16-cv-374 (VSB)

v.

INSURANCE COMPANY OF THE
AMERICAS,

Respondent.

IPA ACQUISITIONS, INC.,

Petitioner,

AFFIDAVIT IN SUPPORT
OF PETITION TO INTERVENE

v.

16-cv-323 (VSB)

GARY THORNLEY HIRST, INSURANCE COMPANY
of the AMERICAS, and certain LLOYD'S
SYNDICATES,

Respondents.

STATE OF WEST VIRGINIA)
COUNTY OF LINCOLN)

Deborah L. Branham, being duly sworn deposes and says:

1. I am a licensed Private Investigator hired through IPA
Acquisitions, Inc. ("IPA") by IPA's attorneys to investigate and
assist in the discovery and investigation of Lloyd's and their

records in London England in 2015 which ultimately resulted in an arbitration award (the "award") in favor of ICA against the Lloyd's syndicates. I attended and assisted in the arbitration proceedings.

2. I was not advised of award against the Lloyd's syndicates. The first that I learned or knew of the award was the challenge to the award by the Lloyd's application to set aside the award which I found by happenstance on Pacer electronic filing. I immediately advised the IPA Attorneys and attorney Hitzke.

3. With the award in jeopardy by the application of Lloyd's, I then learned of an indictment of Hirst on or about June 12, 2016, which contains criminal charges for breach of fiduciary and trust duties seeking forfeiture from Hirst, in the United States District Court for the Southern District of New York, 16 Crim 371, for criminal breach of fiduciary and trust duties, a copy of which indictment which I also passed on to the IPA Attorneys and attorney Hitzke, is attached as Exhibit "B" to Attorney Burn's affidavit.

5. After the grand jury indictment of Hirst was unsealed on May 31, 2016 and made public during the first part of June, 2016 I fortuitously stumbled upon the indictment on Pacer.

6. I make this affidavit in support of the petition and motion of IPA to intervene in in the proceeding brought by Lloyd's of to vacate the award.

A handwritten signature in cursive script, reading "Deborah L. Branham", written over a horizontal line.

Deborah L. Branham

Subscribed and sworn before me

This 10th day of August, 2016

Notary Public